

FILED

JUN 28 2022

BONNIE HACKLER
Clerk, U.S. District Court

By Deputy Clerk

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

22 CR 097 JFH

BRANDON LEE WORKMAN,

Defendant.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

FELON IN POSSESSION OF FIREARM

[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]

On or about May 9, 2022, within the Eastern District of Oklahoma, the Defendant, **BRANDON LEE WORKMAN**, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, a firearm, to wit: one (1) Colt, Model Police Positive Special, .38 Special caliber, revolver, serial number 919200, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

FELON IN POSSESSION OF AMMUNITION

[18 U.S.C. §§ 922(g)(1) & 924(a)(2)]

On or about May 9, 2022, within the Eastern District of Oklahoma, the defendant, **BRANDON LEE WORKMAN**, having previously been convicted of a crime punishable by

imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting commerce, ammunition, to wit: eight (8) rounds of Federal branded .38 Special caliber ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Counts One and Two of this Indictment involving violations of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), the Defendant, **BRANDON LEE WORKMAN**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- One (1) Colt, Model Police Positive Special, .38 Special caliber, revolver, serial number 919200; and
- Approximately thirteen (13) rounds of Federal branded .38 Special caliber ammunition.

CHRISTOPHER J. WILSON
 United States Attorney

A TRUE BILL:

For

 ZACHARY W. PARSONS, TXBA # 24104449
 Assistant United States Attorney

Pursuant to the E-Government Act,
 the original indictment has been filed
 under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY